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April 22, 2011

Via ECF and Facsimile to (973) 645-4412

The Honorable Michael A. Shipp, U.S.M.J.
The United States District Court for the District of New Jersey
Martin Luther King, Jr. Federal Building & United States Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: ***Reyes v. Keith Machinery Corp., et al.***
Civil Action No.: 2:09-CV-5309
Our File No.: 348-1033

Dear Judge Shipp:

This firm represents defendant Keith Machinery Corp. ("KMC") in the above-referenced matter. We are writing to respectfully request, on consent of all parties, a brief, two-week extension of the deadline to serve rebuttal expert reports and remaining discovery deadlines. This request is based upon the fact that our expert is unexpectedly unavailable for the next few weeks, which is beyond the control of KMC.

In particular, we request that the deadlines be extended as follows:

- All rebuttal reports shall be produced by May 17, 2011;
- All expert depositions shall be completed by June 13, 2011; and
- The final pretrial conference shall be held on July 20, 2011.

We appreciate Your Honor's time and attention to this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to be "Scott Haworth", written over a horizontal line.

Scott Haworth
Haworth Coleman & Gerstman, LLC

The Honorable Michael A. Shipp, U.S.M.J.

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So Ordered:

The Honorable Michael A. Shipp, U.S.M.J.

Dated: April _____, 2011

Cc:

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